



Oklahoma State University

Title: Isolating Health Care Clearinghouse Functions	Policy #: SEC-03.01
Category: HIPAA Compliance	Authority: 45 CFR §164.308(a)(4)(ii)(A) HIPAA SECTION: 162.930, 164.105
Standard: Information Access Management	Responsibility: Health Care Components
Effective Date: 4/20/2005	Page 1 of 2
Approved By: OSU Legal Counsel	Revised: 7/1/2013

PURPOSE:

Isolate Clearinghouse Functions

POLICY:

OSU's clearinghouse is part of a larger organization. The clearinghouse must implement policies and procedures that protect the electronic protected health information of the clearinghouse from unauthorized access by the larger organization. §164.308(a)(4)(ii)(A)

PROCEDURE:

1. The vendor contracted for clearinghouse purposes for OSU is to have a Business Associate Agreement in place.
2. Claims are submitted electronically to the clearinghouse vendor or OSU.
3. The clearinghouse vendor sends a report back showing what was received.
4. The clearinghouse vendor or OSU submits claims to the various insurance companies.

For OSU Clearinghouse Functions:

1. OSU will use the NPI of any health care provider (or subpart(s), if applicable) that has been assigned an NPI to identify that health care provider on all standard transactions where that health care provider's identifier is required.
2. When acting as a business associate for another covered entity, OSU's clearinghouse may perform the following functions:
 - (a) Receive a standard transaction on behalf of the covered entity and translate it into a nonstandard transaction (for example, nonstandard format and/or nonstandard data content) for transmission to the covered entity.
 - (b) Receive a nonstandard transaction (for example, nonstandard format and/or nonstandard data content) from the covered entity and translate it into a standard transaction for transmission on behalf of the covered entity.
3. As a hybrid entity, OSU's clearinghouse will not disclose protected health information to OSU Physicians unless a person performs duties for both the clearinghouse and the Physicians Clinics. That member of the workforce will not use or disclose protected health information created or



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received in the course of or incident to the member's work for either the clearinghouse or the Physicians.

- OSU will comply with § 164.316(a) and § 164.530(i), pertaining to the implementation of policies and procedures to ensure compliance with applicable requirements.
- OSU maintains that it is not an Affiliated Covered Entity and complies with § 164.308(a)(4)(ii)(A) isolating the protected health information of the clearinghouse from unauthorized access by OSU Physicians. And will keep this documentation on record for six (6) years, even if the status changes.
- The physical clearinghouse database is stored on separate servers and the network traffic goes through different routers than that of the physicians clinics.